

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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REGENT MUSIC CORPORATION,

07 CIV. 9510 (LLS)

Plaintiff,

-against-

NOTICE OF MOTION
TO DISMISS AMENDED
COMPLAINT

SUGAR HILL MUSIC PUBLISHING, LTD.,
and JOSEPH ROBINSON, JR.,

Defendants.

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PLEASE TAKE NOTICE that upon the annexed declaration of James P. Cinque, Esq. dated April 11, 2008 the exhibits annexed thereto, and upon all pleadings and proceedings heretofore had herein, defendants will move this Court at 9:30 a.m. or as soon as counsel can be heard on May 2, 2008 before the Honorable Louis L. Stanton at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007 for an Order dismissing the amended complaint pursuant to Federal Rules of Civil Procedure 12(b)(6) for failure to state a claim upon which relief can be granted, upon the ground that the record owner of the renewal copyright referred to in the complaint (Registration No. RE 380-196) is not plaintiff and there is no assignment on record of this copyright, which was required under the Copyright Act at the time the renewal copyright was filed.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 6.1(b)

answering papers must be served within ten (10) business days.

DATED: NEW YORK, NEW YORK
APRIL 11, 2008

CINQUE & CINQUE, P. C.

By: _____/s_____
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